

Kirsten A. Milton
Nevada State Bar No. 14401
Cayla J. Witty
Nevada State Bar No. 12897
Thomas W. Maroney
Nevada State Bar No. 13913
JACKSON LEWIS P.C.
300 South Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Email: kirsten.milton@jacksonlewis.com
cayla.witty@jacksonlewis.com
thomas.maroney@jacksonlewis.com

Attorneys for Defendant
Nevada Restaurant Services, Inc. dba
Dotty's and St. Rose Plaza, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SANDRA ELIZABETH RANIERI, an
individual,

Plaintiff,

vs.

NEVADA RESTAURANT SERVICES, INC.
dba Dotty's, a Nevada corporation; ST. ROSE
PLAZA, LLC, a Nevada limited liability
company (Roe Business Entity 1);
CHRISTOPHER J. RODENFELS, manager of
St. Rose Plaza, LLC (Roe Business Entity 2);
SAINT ROSE PLAZA, LLC, a Nevada limited
liability company (Roe Business Entity 3);
VEGAS VALLEY COMMERCIAL, INC., a
Nevada corporation (Roe Business Entity 4);
ROE SECURITY/ALARM COMPANY, a
Nevada business entity (Roe Business Entity 5);
ROE REPAIR/MAINTENANCE COMPANY,
a Nevada business entity (Roe Business Entity
6); SUN PROPERTY MANAGEMENT, LLC,
DOE INDIVIDUALS 1-10 and ROE
BUSINESS OR GOVERNMENTAL
ENTITIES 8-10, inclusive,,

Defendants.

Case No. 2:25-cv-00524-APG-DJA

**STIPULATION AND ORDER
EXTENDING TIME FOR
DEFENDANTS TO FILE AN ANSWER
OR OTHERWISE RESPOND TO
SECOND AMENDED COMPLAINT**

1 IT IS HEREBY STIPULATED by and between Plaintiff Sandra Elizabeth Ranieri
2 (“Plaintiff”), through her counsel the Law Offices of Neal Hyman, and Defendants Nevada
3 Restaurant Services, Inc. dba Dotty’s and St. Rose Plaza, LLC (“Defendants”), through its counsel
4 Jackson Lewis P.C., that Defendants shall have an extension in which to file an answer or
5 otherwise respond to Plaintiff’s Second Amended Complaint (ECF No. 1-3) for one week
6 following this Court’s determination on its Order to Show Cause Why This Case Should Not Be
7 Remanded for Lack of Subject Matter Jurisdiction (ECF No. 4). This Stipulation is submitted and
8 based upon the following:

9 1. Defendants’ answer or pleading in response to the Second Amended Complaint
10 (ECF No. 1-3) is currently due on March 27, 2025.

11 2. On March 24, 2025, the Court issued its Order to Show Cause Why This Case
12 Should Not Be Remanded for Lack of Subject Matter Jurisdiction (ECF No. 4).

13 3. Defendants Nevada Restaurant Services, Inc. (Dotty’s) and St. Rose Plaza, LLC
14 have until April 9, 2025 to respond to the Court’s Order to Show Cause. ECF No. 4.

15 4. Depending on the Court’s determination following Defendants’ response to the
16 Order to Show Cause, this matter may not require the review of responsive pleadings in this Court.

17 5. To minimize expense and unnecessary duplication of efforts in accordance with Fed.
18 R. Civ. P. 1, the Parties agree that allowing Defendants to wait until the issue of removal and/or
19 remand be decided before proceeding with responsive pleadings is best.

20 6. The Parties agree that Defendants’ answer or pleading in response to the Second
21 Amended Complaint would be due one week from the order from this Court determining the
22 removal/remand issue.

23 7. This is the first request for an extension of time for Defendants to answer or
24 otherwise file in response to Plaintiff’s Second Amended Complaint.

25
26 ///

27
28 ///

8. This request is made in good faith and not for the purpose of delay.

9. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 25th day of March, 2025.

JACKSON LEWIS P.C.

LAW OFFICES OF NEAL HYMAN

/s/ Cayla J. Witty

/s/ Neal K. Hyman

Kirsten A. Milton, Bar No. 14401

Neal K. Hyman, Bar No. 5998

Cayla J. Witty, Bar No. 12897

9480 S. Eastern Avenue, Suite 224

Thomas W. Maroney, Bar No. 13913

Las Vegas, Nevada 89123

300 S. Fourth Street, Suite 900

Las Vegas, Nevada 89101

*Attorneys for Plaintiff Sandra Elizabeth
Ranieri*

*Attorneys for Defendant Nevada Restaurant
Services, Inc. d/b/a Dotty's and St. Rose
Plaza, LLC*

IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 5) is **GRANTED IN PART AND DENIED IN PART**. It is granted in part regarding the parties' request for an extension of time. It is denied in part regarding their request that the extension be indefinite. In the interest of setting a concrete deadline that the Court may more easily monitor, the Court sets **May 26, 2025**, as the date by which Defendants must respond to Plaintiff's second amended complaint.



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: March 26, 2025